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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE JANIS L. SAMMARTINO)

UNITED STATES OF AMERICA,)	CASE NO. 07CR3371-JLS
)	
Plaintiff,)	DATE: March 21, 2008
)	TIME: 1:30 p.m.
v.)	
)	NOTICE OF MOTIONS AND MOTIONS TO:
AURELIO DE LOS SANTOS-MENDOZA,)	
)	1) COMPEL DISCOVERY AND PRESERVE
Defendant.)	EVIDENCE; AND
)	2) GRANT LEAVE TO FILE FURTHER
)	<u>MOTIONS</u>

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
RANDY K. JONES, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that, on Monday, March 21, 2008, at 1:30 p.m., or as soon thereafter as counsel may be heard, the accused, Aurelio De Los Santos-Mendoza, by and through his attorneys, John C. Ellis, Jr., and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions listed below.

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MOTIONS

Aurelio De Los Santos-Mendoza, the accused in this case, by and through his attorneys, John C. Ellis, Jr., and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an Order:

- 1) To Compel Further Discovery and Preserve Evidence; and
- 2) To Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

DATED: February 12, 2008

/s/ John C. Ellis, Jr.

JOHN C. ELLIS, JR.

Federal Defenders of San Diego, Inc.

Attorneys for Aurelio De Los Santos-Mendoza